

Hearing Date & Time: December 19th, 2019 at 10:00 a.m. (EST)

FILED
U.S. BANKRUPTCY COURT

EXPERTSOURCE GLOBAL SERVICES PRIVATE LIMITED
Anil Wadhwa, CEO
Address: Unit No. 102, Deekay Tech Park, TTC Industrial Area,
MIDC, Turbhe, Navi Mumbai, Maharashtra, INDIA. 400705

2019 NOV 25 A 9:47
S.D. OF N.Y.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

**ATTN : RETRIEVAL-MASTERS CREDITORS BUREAU, INC. (DEBTOR)
& ALL KNOWN CREDITORS (LIST ANNEXED) OF DEBTOR IN CASE BELOW:**

-----X
In re :
:
:
Debtor : Retrieval-Masters Creditors Bureau, Inc. : Chapter 11
: Case Number: 19-23185-rdd
-----X

NOTICE OF HEARING ON MOTION FOR ADMINISTRATIVE CLAIM 11 U.S.C § 503

PLEASE TAKE NOTICE that on 14th November 2019 an Application of Administrative Claim 11 U.S.C § 503 was filed against the Debtor under Chapter 11 Case Number 19-23185-rdd, by ExpertSource Global Services Private Limited, represented by Anil Wadhwa. (A copy of the claim is attached hereto)

A hearing (the "Hearing") on the Motion for the Administrative Claim 11 U.S.C § 503 will be held before the Honorable Judge Robert D.Drain of the United States Bankruptcy Court for the Southern District of New York (the "Court"), at the Court House, 300 Quarropas Street, White Plains, New York 10601, on **December 19, 2019, at 10:00 a.m. (EDT)**

Dated: November 21, 2019
Navi Mumbai, INDIA

EXPERTSOURCE GLOBAL SERVICES PRIVATE LIMITED
CEO

By: /s/Anil Wadhwa

Anil Wadhwa
Address: Unit No. 102, Deekay Tech Park, TTC Industrial Area,
MIDC, Turbhe, Navi Mumbai, Maharashtra, INDIA. 400 705
Telephone: +1 347.899.4250 Mobile: +91 750 640 4224

Name & Address of Debtor

Name	Retrivel Masters Creditors Bereau, Inc
Address 1	4 Westchester Plaza,
Address 2	Suite 110
Address 3	
City	Elmsford
State	New York (NY)
Postal code	10523
Country (If not US)	

List of Creditors

Name	Address 1	Address 2	Address 3	City	State	Postal Code	Country (if not US)
ACA International	PO Box 390106			Minneapolis	MN	55439	
Ahdoot & Wolfson PC	45 Main Street	Suite 528	Tina Wolfson, Brad King, Theodore Maya	Brooklyn	NY	11201	
Allied Administrators-Delta Dental	PO Box 45381			San Francisco	CA	94145-0381	
Alston & Bird	950 F Street NW		Kimberly Peretti, Kate Hanniford, Emily Poole, Amy Mushahwar	Washington	DC	20004	
Altice Business	PO Box 360111			Pittsburg	PA	15251	
American Express	PO Box 981535			El Paso	TX	79998	
Andrew Berkowitz	725 Lisa Circle			Huntingdon Valley	PA	19006	
Apex Technology Services	535 Connecticut Avenue	Suite 104		Norwalk	CT	06854	
Berger Montague, PC	1818 Market Street	Suite 3600	Jon Lambiras, Shanon Carson, Sherrie Savett	Philadelphia	PA	19103	
Bisnar Chase LLP	1301 Dove Street	Suite 120	Brian D Chase, Jerusalem Beligan	Newport Beach	CA	92626	
Business Card Services (Jet Blue Mastercard)	PO Box 23066			Columbus	GA	31902	
Cablevision	PO Box 742698			Cincinnati	OH	45274-2698	

Carella Byrne Cecchi Olstein Brody & Agnello, PC	5 Becker Farm Road		James Cecchi, Caroline Bartlett	Roseland	NJ	07068	
Cary Law Office	122 Capitol St	Suite 200	Michael Cary	Charlston	WV	25301	
Charles River Associates	200 Clarendon Street			Boston	MA	02116	
Clearbrook JV LLC	100 Clearbrook Rd	2nd Floor		Elmsford	NY	10523	
Cohn, Lifland, Pearlman, Herrmann & Knoff, LLP	250 Pehle Avenue	Suite 401	Peter Pearlman	Saddlebrook	NJ	07663	
Conduent	375 McCarter Highway		David Kenney	Newark	NJ	07114	
Consolidated Edison, Inc.	PO Box 1702			New York	NY	10116- 1702	
Creditron Corporation	15800 Crabbs Branch Way	Suite 210		Rockville	MD	20855	
Criden & Love P.A.	7301 SW 57th Court	Suite 515	Michael E. Criden	South Miami	FL	33143	
CSI International, Inc.	PO Box 417			Williamsport	OH	43164	
CT Corporation	PO Box 4349			Carol Stream	IL	60197- 4349	
Cup-A-Jo Coffee Solutions	382 Route 59 Suite 324			Monsey	NY	10952	
Dicello Levitt Gutzler LLC	Ten North Dearborn Street	Eleventh Floor	Adam Levitt, Amy Keller	Chicago	IL	60602	
End Point Corporation	304 Park Avenue South	Suite 214		New York	NY	10010	
Epiq Corporate	10300 SW Allen Blvd		Managing Director,	Beaverton	OR	97005	

Services, Inc			Legal Department				
Esensten Law	12100 Wilshire Blvd	Suite 1660	Robert Esensten, Jordan Esensten	Los Angeles	CA	90025	
ExpertSource Global Services Private Limited	Unit 102, 1st Floor	Deekay Tech Park, TTC Industrial Area	Midc, Turbhe	Navi Mumbai, Maharashtra			India
FedEx	PO Box 371461			Pittsburgh	PA	15250- 7461	
Finkelstein Blankinship, Frei-Pearson & Garber, LLP	445 Hamilton Avenue	Suite 605	Jeremiah Lee Frei- Pearson	White Plains	NY	10601	
Geist Schwarz & Jellinek, PLLC	One North Lexington Avenue	11th floor		White Plains	ny	10601	
Giatras Law Firm	118 Capitol Street	Suite 400	Troy Giatras, Matthew Stonestreet, Phillip Childs	Charlston	West Virginia	25301	
Gibbs Law Group LLP	501 14th Street	Suite 1110	Eric Gibbs, David Berger	Oakland	CA	94612	
Golden Scz Gagain	201 North Armenia Avenue		Charles McHale	Tampa	FL	33609	
Greenwich Legal Associates LLC	881 Lake Avenue		Adam Frankel	Greenwich	CT	06831	
Hinshaw & Culbertson, LLP	151 N. Franklin Street	Suite 2500		Chicago	IL	60606	
Hogan & Lovells US LLP	555 Thirteenth St NW		Marcy Wilder, Allison Holt	Washington	DC	20004	
Hudson Valley Fire Inc.	136 Washington Street			Peekskill	NY	10566	

Hyde & Swigert	2221 Camino Del Rio South	Suite 101	Joshua Swigert	San Diego	CA	92101	
International Business Machines Corp.	PO Box 643600			Pittsburgh	PA	15264-3600	
Jackson Lee PA	1991 Longwood Lake Nary Rd		Jared Michael Lee	Longwood	FL	32750	
Javerbaum Wurgafit Hicks Kahn Wikstrom and Sinins PC	1000 Haddonfield-Berlin Road	Suite 203	Michael Galpern	Vorhees	NJ	08043	
Jones Wolf & Kapasi LLC	375 Passaic Ave	Suite 100	Joseph Jones	Fairfield	NJ	07004	
JP McHale Pest Management, Inc.	PO Box 98			Montrose	NY	10548	
Kaplan Fox & Kilsheimer LLP	350 Sansome Street	Suite 400	Laurence King, Mario Choi	San Francisco	CA	94104	
Kaplan Fox & Kilsheimer LLP	850 Third Avenue	14th Floor	Frederic Fox, Joel Strauss, David Straite	New York	NY	10022	
Kazerouni Law Group, APC	245 Fischer Avenue	Suite D1	Seyed Abbas Kazerounian	Costa Mesa	CA	92626	
Kehoe Law Firm PC	41 Madison Avenue	31st Floor	John Kehoe	New York	NY	10010	
Kelly Law Offices LLC	3000 Atrium Way	Suite 291	Thomas Kelly III	Mount Laurel	NJ	08054	
Konica Minolta Premier Finance	PO Box 3072			Cedar Rapids	IA	52406	
Law Offices of Todd Friedman PC	21550 Oxnard Street	Suite 780	Todd Friedman	Woodland Hills	CA	91367	

Law Offices of Ron Bochner	3905 State St		Ron Bochner	Santa Barbara	CA	93105	
Lemberg Law LLC	43 Danbury Road	3rd Floor	Sergei Lemberg	Wilton	CT	06897	
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA	316 S Baylen St	Suite 600	Matt Schultz, Bill Cash, Brenton Goodman	Pensacola	FL	32502	
LexisNexis Risk Solutions	1000 Alderman Drive			Alpharette	GA	30005	
Liberty Mutual Insurance	PO Box 2839			New York	NY	10116-2839	
Lieff Cabraser Heimann & Bernstein LLP	250 Hudson Street	8th Floor	Jason Lichtman, Sean Petterson	New York	NY	10013	
Lieff Cabraser Heimann & Bernstein LLP	275 Battery Street	29th Floor	Michael Sobol	San Francisco	CA	94111	
Linda S. Allen	4713 Caspian Ave.			Farmington	NM	87402	
Lite Depaqlma Greenberg LLC	570 Broad Street	Suite 1201	Bruce Greenberg	Newark	NJ	07102	
Locks Law Firm LLC	801 N. Kings Highway		James A. Barry	Cherry Hill	NJ	08034	
Mack-Cali CW Realty Associates LLC	PO Box 416382			Boston	MA	02241	
Messer Strickler, Ltd.	225 W. Washington St.	SUITE 575		Chicago	IL	60606	
Michael P. McIlree, Attorney at Law	100 Brown Avenue	Suite 2		Chesterson	IN	46304	

Morgan & Morgan Complex Litigation Group	201 N. Franklin Street	7th Floor	John Yanchunis,Patrick Barthle	Tampa	FL	33602	
Nussbaum Law Group PC	1211 Avenue of the Americas	40th Floor	Linda Nussbaum, Bart Cohen	New York	NY	10036	
O'Connell & Aronowitz	54 State Street		Kurt Bratten	Albany	NY	12207	
Online Data Exchange LLC	12276 San Jose Blvd	Suite 427		Jacksonville	FL	32223	
Oxford Health Plans	PO BOX 1697			Newark	NJ	07101-1697	
Paylocity Corporation	Dept #2007	Po Box 87844		Carol Stream	IL	60188	
PCI Group, Inc.	PO Box 566			Pineville	NC	28134-0566	
Pitney Bowes Global Financial Services LLC	PO Box 3718877			Pittsburgh	PA	15250	
Pontello & Bressler	406 Boones Lick Rd		Dominic Pontello	St Charles	MO	63301	
Prescott Lovern Sr	No address available: see below:						
Proshred Security	5 W. Main Street	Suite 200		Elmsford	NY	10523	
Protection One Alarm Monitoring, Inc.	PO BOX 219044			Kansas City	MO	64121-9044	
Robbins Geller Rudman & Dowd LLP	120 East Palmetto Park Road	Suite 500	Paul Geller, Stuart A. Davisdon	Boca Raton	FL	33432	

Robbins Geller Rudman & Dowd LLP	58 S. Service Road	Suite 200	Samuel H. Rudman, Mark S. Reich	Melville	NY	11747	
Robert L. Clark	131 Overlook Ter			Lander	WY	82520	
Robinson Calcagnie Inc	19 Corporate Plaza Drive		Daniel Robinson	Newport Beach	CA	;92660	
Ropes & Gray	2099 Pennsylvania Ave, NW		Edward McNicholas	Washington	DC	20006	
Russell Fuchs	975 Banks North Road			Fairfield	CT	06824	
Sauder Schelkopf LLC	555 Lancaster Avenue		Joseph Sauder, Matthew Schelkopf, Joseph Kenney	Berwynn	PA	19312	
Seeger Weiss LLP	55 Challenger Road	6th Floor	Christopher Seeger, Parvin Aminolroaya	Ridgefiled Park	NJ	07660	
Seeger Weiss LLP	77 Water Street	8th Floor	Jennifer Scullion	New York	NY	10005	
Sentient Solutions Limited	Guinness Enterprise Centre	Taylor's lane		Dublin 8			Ireland
Service Express, Inc	Dept 6306	PO Box 30516		Lansing	MI	48909	
Sessions Firm, LLC	3850 N. Causeway Blvd	Suite 200		Metairie	LA	70002	
Sheehan & Associates, PC	505 Northern Blvd	Suite 311	Spencer Sheehan	Great Neck	NY	11201	
Sidley Austin	1501 K Street NW		David Hoffman, Kate Heinzelman, Clayton Northouse	Washington	DC	20005	
Staples Business Advantage	PO Box 105638			Atlanta	GA	30348-5638	
Suburban Carting Co.	566 North State Rd			Briarcliff Manor	NY	10510	

List of Creditors

The Answer Company	PO Box 3442			New York	NY	10163-3442	
The Law Offices of Andres Montej o, Esq	6157 NW 167th Street	Suite F-21	Andres Montej o	Miami	FL	33015	
The Law Offices of Gary Merenstein, P.C	773 Furrow Way			Lafayette	CO	80026	
Trans Union, LLC	PO Box 99506			Chicago	IL	60693-9506	
Vanguard Cleaning Systems	155 Airport Executive Park			Nanuet	NY	10954	
Verizon Wireless	PO Box 408			Newark	NJ	07101	
Waller Lansden Dortch & Davis LLP	511 Union Street	Suite 2700	Derek Edwards	Nashville	TN	37219	
Webrecon, LLC.	6115 28th St. SE	Suite 214		Grand Rapids	MI	49546	
Windstream Enterprise	PO Box 70268			Philadelphia	PA	19176-0268	
Worldpay ISO Inc	8500 Governors Hill Dr	MD 1GH2X2		Symmes Township	OH	45249	
Yanwitt LLP	140 Grand Street	Suite 705	Russell Marc Yankwitt	White Plains	NY	10601	

14th November 2019

Kind Attention:

Honourable Judge Robert D.Drain
U.S Bankruptcy Court
Southern District of New York

FILED
U.S. BANKRUPTCY COURT

2019 NOV 14 P 2:04

S.D. OF N.Y.

Debtor: Retrieval-Masters Creditors Bureau, Inc.
Case Number: 19-23185-rdd

Subject : Application for Administrative Claim

Respected Sir,

We are herewith filing an application for claim of post-petition charges that are due from above mentioned debtor.

The charges for post-petition activity of \$80,000 were agreed by Mr.Russell Fuchs, owner CEO of the Debtor, Mr.Jeff Wollman their CFO & COO under knowledge of their attorney Mr.Steven Wilamowsky.

We have completed the activity for which these charges were agreed to, subsequently we have only received \$68,750 from the debtor leaving unpaid charges of \$11,250.

For your ready reference please find attached:

- 1) Email chain of agreement between the concerned parties
- 2) Proof of activity completion
- 3) Administrative Claim Working: Reflecting statement of payments received & outstanding balance.

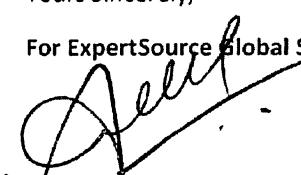
We are hereby requesting for acceptance of this application and an order approving this claim.

I am also requesting your honourable office that if any hearing needs to take place for this matter, it should be considered to conduct the same on telephone as I am based in Mumbai, India.

I humbly request your prompt attention in this matter.

Yours Sincerely,

For ExpertSource Global Services Private Limited



Anil Wadhwa
CEO

Address: Unit 102, Deekay Tech Park, TTC Industrial Area,
MIDC, Turbhe, Navi Mumbai, Maharashtra, INDIA. 400705

Email: Anil@expertsource.com

Mobile: +91 750 640 4224 Office: +1 347.899.4250

ACCOUNTS

From: Anil Wadhwa [anil@expertsource.com]
Sent: Thursday, October 31, 2019 2:05 AM
To: 'ACCOUNTS'
Subject: FW: RE: Make PDF

From: Anil Wadhwa [mailto:anil@expertsource.com]
Sent: Friday, June 21, 2019 2:14 AM
To: 'Russ Fuchs'
Cc: 'Jeff Wollman'; wilamowsky@chapman.com
Subject: RE: RE:

OK. Accepting your original offer of \$35000 this week and \$45000 over next 4 weeks.

Anil Wadhwa

From: Russ Fuchs [mailto:tkrf@aol.com]
Sent: Friday, June 21, 2019 2:12 AM
To: Anil Wadhwa
Cc: Jeff Wollman; wilamowsky@chapman.com
Subject: Re: RE:

Cannot Anil.

Russ

On Jun 20, 2019, at 4:37 PM, Anil Wadhwa <anil@expertsource.com> wrote:

Jeff,
We are in agreement in principle. Request you to try and increase some amount for this week to say around \$45000 and future weeks payments can be reduced to \$35000.

Anyways expecting this week's wire by tomorrow.

Anil Wadhwa

From: Jeff Wollman [mailto:jwollman@retrievalmasters.com]
Sent: Thursday, June 20, 2019 9:45 PM
To: Anil Wadhwa; Russell Fuchs AOL
Cc: wilamowsky@chapman.com
Subject: Re:

Anil,

Russ is in his car however I conveyed the information you wrote in your last text to me. As of now our offer below still stands but we cannot deviate from it.

Sincerely,

<image001.gif>

Jeffrey S Wollman
Chief Financial Officer
Retrieval-Masters Creditors Bureau, Inc.
American Medical Collection Agency
4 Westchester Plaza, Suite 110 (Overnight Mail)
PO Box 160 (Regular Mail)
Elmsford, NY 10523
914 721-8666 (Direct)
800 666-8097 (Office)
914 345-7134 (Fax)
914 772-2298 (Mobile)

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From: Anil Wadhwa <anil@expertsource.com>
Date: Thursday, June 20, 2019 at 11:17 AM
To: Russell Fuchs <tkrf@aol.com>
Cc: Jeffrey Wollman <jwollman@retrievalmasters.com>, Steven Wilamowsky <wilamowsky@chapman.com>
Subject: RE: RE:

In that case I am afraid we will be at a dead end, with more troubles to pile up.

Anil Wadhwa

From: Russ Fuchs [mailto:tkrf@aol.com]
Sent: Thursday, June 20, 2019 8:18 PM
To: Anil Wadhwa
Cc: jwollman@retrievalmasters.com; wilamowsky@chapman.com
Subject: Re: RE:

Sorry Anil.

I don't have it.

Russ

On Jun 20, 2019, at 10:33 AM, Anil Wadhwa <anil@expertsource.com> wrote:

Russell,
I am willing to accept the budget cut to \$2000 for next 4 weeks and guarantee you we will staff the lines if you pay us as per below schedule. Here is the proposal –

1. Charges Billed to you up until 13th June: \$80,000
2. This week expected billing: \$12,000
3. Next 4 weeks (4 x 2000): \$ 8000

4. Total: \$100,000

We need to receive minimum \$50,000 from you this week. And remaining \$50,000 in next 4 weeks \$12500 each week. I am not negotiating here but only asking for money to survive.

Anil Wadhwa

From: tkrf@aol.com [mailto:tkrf@aol.com]
Sent: Thursday, June 20, 2019 7:40 PM
To: anil@expertsource.com; jwollman@retrievalmasters.com; wilamowsky@chapman.com
Subject: re:

Trying to see if we can do something, but if you are not willing to budge from what is the most I can do, there won't be anything to talk about..

I don't agree with your 30,000 deficiency from our prior collection programs. So it's not on the table.

You have incurred \$50,000 in costs that were not necessary for the inbound from notices.

You can cut your staff to @ \$2,000 per week for the next 4 weeks.

I am willing to give you 35,000. this week and then the remaining 45,000 over the next 4 weeks as long as you operate.

I won't negotiate any further.

Russ

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Disclaimer: The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

4 Week Activity Details as Below

Date	Day	FTE	Calls Offered	Calls Answered	Answered Level %	Average Speed to Answer	Abandoned In Queue	Abandoned Before Call Queue	Abandoned Level %	Net Login Hrs	Handle Time	AHT
24-Jun	Mon	10	486	473	97.33%	0:00:08	7	6	1.46%	79:47:24	28:26:01	0:03:36
25-Jun	Tue	7	353	339	96.03%	0:00:08	11	3	3.14%	56:17:16	19:28:39	0:03:27
26-Jun	Wed	6	287	277	96.52%	0:00:13	7	3	2.46%	43:15:44	15:46:43	0:03:25
27-Jun	Thu	6	233	224	96.14%	0:00:09	8	1	3.45%	48:09:41	12:59:56	0:03:29
28-Jun	Fri	6	184	182	98.91%	0:00:08	1	1	0.55%	45:19:44	9:59:10	0:03:18
Week 1		7	1543	1495	96.89%	0:00:09	34	14	2.22%	272:49:49	86:40:29	0:03:29
1-Jul	Mon	5	234	226	96.58%	0:00:16	6	2	2.59%	40:01:13	12:43:08	0:03:23
2-Jul	Tue	4	160	152	95.00%	0:00:08	7	1	4.40%	32:59:20	6:17:32	0:02:29
3-Jul	Wed	4	131	126	96.18%	0:00:19	5	0	3.82%	40:17:44	6:04:14	0:02:53
4-Jul	Thu											
5-Jul	Fri	4	113	110	97.35%	0:00:07	2	1	1.79%	39:32:43	7:27:35	0:04:04
Week 2		4	638	614	96.24%	0:00:12	20	4	3.15%	152:51:00	32:32:29	0:03:11
8-Jul	Mon	2	138	131	94.93%	0:00:33	6	1	4.38%	17:00:28	7:34:31	0:03:28
9-Jul	Tue	2	124	118	95.16%	0:00:20	5	1	4.07%	17:39:03	6:13:44	0:03:10
10-Jul	Wed	2	75	75	100.00%	0:00:18	0	0	0.00%	16:13:53	3:32:54	0:02:50
11-Jul	Thu	2	88	82	93.18%	0:00:15	5	1	5.75%	14:46:13	3:03:11	0:02:14
12-Jul	Fri	2	78	71	91.03%	0:00:13	6	1	7.79%	17:58:43	3:55:15	0:03:19
Week 3		2	503	477	94.83%	0:00:20	22	4	4.41%	83:38:20	24:19:35	0:03:04
15-Jul	Mon	2	92	92	100.00%	0:00:12	0	0	0.00%	18:22:15	5:04:20	0:03:18
16-Jul	Tue	2	87	79	90.80%	0:00:55	8	0	9.20%	15:23:59	4:01:46	0:03:04
17-Jul	Wed	2	53	52	98.11%	0:00:07	0	1	0.00%	17:23:38	2:09:12	0:02:29
18-Jul	Thu	2	124	117	94.35%	0:00:26	5	2	4.10%	18:11:38	6:57:42	0:03:34
19-Jul	Fri	2	136	125	91.91%	0:00:19	9	2	6.72%	18:05:27	6:40:17	0:03:12
Week 4		2	492	465	94.51%	0:00:24	22	5	4.52%	69:15:19	24:53:17	0:03:13

US Holiday

Administrative Expenses Claim working under 11 U.S.C 503.

Particulars	Amount (\$)
Agreed Offer amount	\$80,000.00
Total Receivable (A)	\$80,000.00
Payments receipt details of above offer amount	
Payment Receipt date	Payment receipt Amount
24.06.2019	\$35,000.00
01.07.2019	\$11,250.00
04.07.2019	\$11,250.00
15.07.2019	\$11,250.00
Total Receipt (B)	\$68,750.00
Balance amount receivable (A-B)	\$11,250.00